

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

<p>In re:</p> <p>THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,</p> <p>as representative of</p> <p>THE COMMONWEALTH OF PUERTO RICO, <u>et al.</u></p> <p>Debtors.¹</p>	<p>PROMESA Title III</p> <p>Case No. 17 BK 3283-LTS</p> <p>(Jointly Administered)</p>
<p>In re:</p> <p>THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO</p> <p>as representative of</p> <p>PUERTO RICO ELECTRIC POWER AUTHORITY,</p> <p>Debtor.</p>	<p>PROMESA Title III</p> <p>Case No. 17 BK 4780-LTS</p> <p>Re: ECF Nos. 16820, 16833, 16950 and 16952 in Case No. 17 BK 3283-LTS and ECF Nos. 2498, 2499, 2517 and 2521 in Case No. 17 BK 4780-LTS</p> <p>This Urgent Motion Relates Only to PREPA and Shall Only Be Filed in Case No. 17 BK 4780-LTS</p>

**URGENT MOTION TO EXTEND
DATES IN SCHEDULING ORDER**

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations.)

To the Honorable Laura Taylor Swain, United States District Judge:

Foreman Electric Services Inc. (the “Movant”) hereby submits this urgent motion for an order extending all dates in the scheduling order that this Court entered on June 25, 2021 (ECF No. 17170)² (the “Scheduling Order”).

1. On May 28, 2021, Movant filed the *Verified Motion of Foreman Electric Services Inc. for Allowance of Administrative Expense Claim* (the “Motion”) (ECF No. 16820).

2. On the same date, the Honorable Court entered a scheduling order granting until June 11, 2021, at 5:00 p.m. AST to file responsive papers to the Motion and until June 18, 2021, at 5:00 p.m. AST to file Movant’s reply papers.

3. On June 11, 2021, PREPA and Movant (the “Parties”) filed an *Urgent Joint Motion to Extend Dates in Scheduling Order* (ECF No. 16950) (the “Joint Motion”). In the Joint Motion, the Parties informed the Honorable Court that PREPA needed additional time to further evaluate the claims made by Movant in the Motion and that the Parties had conferred to discuss PREPA’s need to amend the briefing schedule.

4. The Parties requested the Court to set June 25, 2021, as deadline for PREPA to file responsive papers to the Motion and July 9, 2021, as deadline for Movant to respond to responsive papers filed by PREPA. On June 11, 2021, the Court entered an Order granting the Parties’ request (ECF No. 16952).

5. On June 25, 2021, the Parties filed another *Urgent Joint Motion to Extend Dates in Scheduling Order* (ECF No. 17169). On that same date, this Court granted the Parties’ request and entered an order extending the PREPA to file responsive papers to the Motion until July 16, 2021 and Foreman’s Reply is due by July 30, 2021 at 11:59 p.m. (ECF No. 17170).

² Reference to Case No. 17 BK 3283-LTS.

6. On July 16, 2021, PREPA filed its *Objection to Verified Motion of Foreman Electric Services Inc. for Allowance of Administrative Expense Claim*, (ECF No. 17403).

7. Foreman commenced the drafting of its Reply. However, Movant needs additional time to complete the process and discuss with the client PREPA's factual and legal discussion. Therefore, an extension of time until August 16, 2021 at 11:59 p.m. is respectfully requested for Foreman to file the Reply.

8. The undersigned has conferred with PREPA's counsel to discuss Foreman's request for an additional term to file its Reply and she has no objection.

9. Good cause exists to grant this Urgent Motion. The requested extension of time is reasonable and PREPA has consented to the extension, therefore, no disadvantage or harm will be inflicted on any of them by the Court's approval of the requested extension. Furthermore, PREPA has requested additional time to submit English translations of Spanish-language case law.

**CERTIFICATION OF COMPLIANCE WITH LOCAL
RULE 9013-1 AND THE FOURTEENTH AMENDED CASE MANAGEMENT
PROCEDURES**

10. Pursuant to Local Rule 9013-1 and ¶ I.H of the Fourteenth Amended Notice, Case Management and Administrative Procedures Order, Dkt. 15894-1, the Parties hereby certify that they have (a) carefully examined the matter and concluded that there is a true need for an urgent motion; (b) not created the urgency through any lack of due diligence; (c) made a bona fide effort to resolve the matter; (d) made reasonable, good-faith communications in an effort to resolve or narrow the issues that are being brought to the Court; and (e) been in contact with each other, and all Parties have consented to the relief requested herein.

11. In accordance with Paragraph II.F of the Case Management Procedures, the Parties have provided notice of this motion to all counsel of record. The Parties submit that, in light of the nature of the relief requested, no other or further notice need be given.

12. No prior request for the relief sought in this Urgent Motion has been made to this or any other court.

CONCLUSION

For the foregoing reasons, the Parties respectfully request the Court enter the Proposed Order attached as **Exhibit A**, granting the relief requested herein and all other relief as is just and proper.

Dated: July 28, 2021

San Juan, Puerto Rico.

MCCONNELL VALDES LLC

Counsel for Foreman

270 Munoz Rivera Avenue, Suite 900

Hato Rey, Puerto Rico 00918

P.O. Box 364225

San Juan, PR 00936

Tel. 787-759-9292

Fax. 787-759-8282

By: s/Antonio A. Arias-Larcada

Antonio A. Arias-Larcada

USDC PR 204906

aaa@mcvpr.com

By: s/Rosamar García-Fontán

Rosamar García-Fontán

USDC PR 221004

rgf@mcvpr.com

EXHIBIT A

Proposed Order